

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

IN RE:)	
)	
JAKE TAYLOR, xxx-xx-2820)	Case No. 11-80431
)	CHAPTER 13
P. O. Box 833)	
Talihina, OK 74571)	
)	
Debtor.)	

**DEBTOR'S OBJECTION TO MOTION FOR RELIEF FROM
AUTOMATIC STAY AND FOR ABANDONMENT**

COMES NOW the Debtor, Jake NMN Taylor (hereinafter referred to as "Debtor"), and hereby objects to the Motion for Relief From Automatic Stay And Abandonment Of Property filed herein by the Creditor, Wells Fargo Bank, N.A. (hereinafter referred to as "Creditor"), and would show the Court as follows, to-wit:

1. The subject real estate property which is the subject of Creditor's motion is Debtor's homestead property.
2. The subject real estate property is Debtor's home and 80 acres.
3. The subject real estate property has a real estate market value of approximately \$300,000.00.
4. The outstanding principal balance owed to the Creditor is \$99,991.67 plus accruing interest, attorney fees, costs, expenses and other allowable charges.
5. The Debtor has obtained an Order from this Court allowing him to hire a real estate agent for the sale of his real estate property and the Debtor has retained and employed SE Oklahoma Realty of Talihina, Oklahoma, as his agent.
6. The Debtor is actively attempting to sell the subject real estate property.
7. The Debtor intends to sell the subject real estate property and then intends to immediately pay off the entire balance owed to the Creditor as part of that same transaction.
8. The Debtor disputes the Creditor's allegation that relief from the automatic stay is necessary at this time to protect the Creditor's interests in the real estate property.

9. The Debtor disputes the Creditor's allegation that the Creditor will suffer irreparable injury, loss and damage unless the automatic stay is terminated so as to permit the Creditor to commence with a foreclosure action.

WHEREFORE, the Debtor moves and requests this Court to deny the Motion For Relief From Automatic Stay And For Abandonment filed herein by the Creditor.

Respectfully submitted,

By: /s/ Jeff P. Herrick
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